

**IN THE UNITED DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>SHAWN REAVES on behalf of him and others similarly situated,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>CIVIL ACTION NUMBER:</b>
	)	<b>3:05-CV-900-WKW</b>
	)	
<b>WILDCAT INVESTMENTS, LLC, AND B&amp;B FOODS, L.L.C.,</b>	)	
	)	
<b>Defendants.</b>	)	

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINES**

Plaintiff moves this honorable Court for an Order extending the deadlines in this case by sixty days. As grounds for this Motion, plaintiff states as follows:

1. On January 30, 2006, this Court entered a Scheduling Order for this case which provided, among other things, that class certification would be sought by Plaintiff by April 25, 2006 and that the parties would have until April 10, 2006 to add parties or amend the pleadings.

2. On January 13, 2006, in anticipation of these deadlines, Plaintiff propounded his first discovery requests to Defendant. Defendant is still in the process of gathering documents responsive to Plaintiff's discovery requests. Because the responses to plaintiff's discovery requests are essential to plaintiff's request for class certification and to plaintiff's seeking to amend the pleadings and add parties, and those documents have not yet been provided, plaintiff seeks an additional sixty days, until June 26, 2006, to move for class certification and until June 12, 2006 to amend the pleadings or add parties.

Plaintiff also seeks to extend the other deadlines in this case by sixty days, as they may also be affected by this Court's ruling on class certification or any motion to amend the pleadings or add parties, particularly as a collective action.

3. Defendant does not oppose the requested extension.

WHEREFORE, premises considered, Plaintiff respectfully requests that this Court extend the deadlines in this case by sixty days.

Respectfully submitted,

s/Jon C. Goldfarb  
Jon C. Goldfarb  
Maury S. Weiner  
Counsel for Plaintiff

**OF COUNSEL:**

Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203  
Telephone No.: (205) 314-0500  
Facsimile No.: (205) 254-1500

**CERTIFICATE OF SERVICE**

I do hereby certify that I have filed a copy of the above and foregoing document with the Clerk of Court using the CM/ECF system which will send electronic notification to the following counsel of record:

Gregory H. Andrews  
Isham R. Jones, III  
Kerry Lin Davidson  
Andrews Koehler & Passarelli, P.C.  
4343 Commerce Court, Suite 615  
Lisle, Illinois 60532

this the 9<sup>th</sup> day of March, 2006.

s/Jon C. Goldfarb  
OF COUNSEL